UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

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SUPERSEDING INFORMATION

S5 07 Cr. 387 (CLB)

SAILE PARRA,

Defendant. :

## COUNT ONE

The United States Attorney charges:

about January 3, 2007, in the Southern District of New York and elsewhere, SAILE PARRA, the defendant, together with others known and unknown, unlawfully, willfully, and knowingly, conspired to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), to wit, to wit, three armed robberies of trucks in or around Blauvelt, New York, Allamuchy Township, New Jersey, and Pine Grove, Pennsylvania, and thereby obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3).

(Title 18, United States Code, Section 1951(a).)

#### COUNT TWO

The United States Attorney further charges:

2. From in or about September 2006 through on or

about January 3, 2007, in the Southern District of New York and elsewhere, SAILE PARRA, the defendant, together with others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate the laws of the United States.

3. It was a part and an object of the conspiracy that SAILE PARRA, together with others known and unknown, unlawfully, willfully, and knowingly, would and did seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold for ransom and reward and otherwise persons, and did transport those persons in interstate commerce, in violation of Title 18, United States Code, Section 1201(a)(1).

### OVERT ACTS

- 4. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:
- a. On or about November 14, 2006, SAILE PARRA and co-conspirators not named herein kidnapped an individual in or around Allamuchy Township, New Jersey, and transported that individual to in or around the Bronx, New York.
- b. In or about November 2006, SAILE PARRA and coconspirators not named herein kidnapped an individual in or

around Pine Grove, Pennsylvania, and traveled to in or around Paterson, New Jersey.

(Title 18, United States Code, Section 1201(c).)

# COUNT THREE

The United States Attorney further charges:

about January 2007, in the Southern District of New York and elsewhere, SAILE PARRA, the defendant, together with others known and unknown, unlawfully, willfully, and knowingly used and carried firearms, during and in relation to crimes of violence for which he may be prosecuted in a court of the United States, namely, the violations of Title 18, United States Code, Sections 1951 and 1201 as charged in Counts One and Two of this Information, and possessed firearms in furtherance of such crimes, which firearms were brandished.

(Title 18, United States Code, Section 924(c)(1)(A)(ii) and 2.)

## COUNT FOUR

The United States Attorney further charges:

6. From in or about December 2006 through in or about March 2007, in the Southern District of New York and elsewhere, SAILE PARRA, in a matter within the jurisdiction of the executive branch of the Government of the United States, unlawfully,

knowingly and willfully, made materially false, fictitious, and fraudulent statements and entries.

(Title 18, United States Code, Section 1001(a)(2).)

MICHAEL J. GARCIA

United States Attorney